

# EXHIBIT 9

Jay Lawrence  
November 05, 2019

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE DISTRICT OF NEBRASKA  
3                   - - -  
4       RYSTA LEONA SUSMAN,           )  
5       Both Individually and           )  
6       as Legal Guardian of           )  
7       SHANE ALLEN LOVELAND;       )   CASE NO. 8:18CV127  
8       and JACOB SUMMERS           )  
9                   Plaintiffs,       )   SUBJECT TO  
10       vs.                            )   PROTECTIVE ORDER  
11       THE GOODYEAR TIRE &       )  
12       RUBBER COMPANY,           )  
13                   Defendant.       )

14                   - - -  
15                   Videotaped deposition of JAY K.  
16       LAWRENCE, a witness herein, called by the  
17       Plaintiffs for Examination pursuant to the  
18       Federal Rules of Civil Procedure, taken before  
19       me, the undersigned, Binnie Denise Purser, a  
20       Registered Diplomate Reporter, Certified  
21       Realtime Reporter and Notary Public in and for  
22       the State of Ohio, pursuant to Notice and  
23       agreement of counsel at the offices of Court  
24       Reporters, Inc., 221 Springside Drive, Akron,  
25       Ohio, on Tuesday, the 5th day of November, 2019,

1 tire internally.

2 Q. And that change or alteration of the  
3 tire is what leads to the failure, fair?

4 A. I suppose if by alteration, you mean  
5 the changes that I enumerated, then, yes.

6 Q. Like broken belts or whatever else it  
7 would be that would be needed to lead to a  
8 separation like the one we have, correct?

9 A. It can produce a change that can be  
10 very, very small, almost microscopic or it can  
11 be larger. There is a whole range of things  
12 that the impact can produce inside that tire.

13 Q. Right. Whatever it is, though, in your  
14 opinion, based on the questions you have been  
15 asked today, for impact to cause -- this is your  
16 opinion. I am not saying I agree with it.

17 But is it fair to say that a fair  
18 characterization of your opinions as it concerns  
19 impact is that when a tire is impacted by  
20 something, whatever it may be, something within  
21 that tire changes or is altered such that the  
22 tire later fails as the result of a tread  
23 separation?

24 A. I believe that is what I said, yes.

25 Q. Okay. All right. Now, are you